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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)	2:15-cr-00198-GMN-NJK
)	
Plaintiff,)	
)	
v.)	UNITED STATES' UNOPPOSED
)	MOTION FOR AN EXTENSION OF
JUNZO SUZUKI & PAUL SUZUKI,)	TIME TO FILE ITS BRIEF REGARDING
)	RESTITUTION
Defendants.)	

The United States of America, through Joseph S. Beemsterboer, Acting Chief of the Criminal Division, Fraud Section (Cory E. Jacobs, Assistant Chief, and Della Sentilles, Trial Attorney, appearing) and Christopher Chiou, Acting United States Attorney (Jessica Oliva, Assistant United States Attorney, appearing), by and through its undersigned counsel, respectfully

1 moves the Court for an unopposed three-day extension of time to file its brief regarding restitution.

2 In support of its motion, the government states as follows:

3 1. On April 5, 2021, the Court sentenced the defendants Junzo Suzuki and Paul Suzuki
4 to a 60-month (*i.e.*, five-year) term of imprisonment followed by a three-year period of supervised
5 release. Per the parties' request, to which the Court agreed, the restitution amount was to be
6 determined at a later date. ECF Nos. 515-516.

7 2. This Court set the restitution hearing for June 28, 2022. Currently, the
8 government's brief regarding restitution is due on May 3, 2022 and the defendants' response is
9 due on May 31, 2022. *Id.*

10 3. As admitted in the defendants' plea agreements, between approximately April 2012
11 and April 2013, the defendants induced over one-thousand investors to invest more than \$141
12 million in MRI International Inc. ECF No. 487-8 ¶ 12.

13 4. The government has been working expeditiously to provide the Court with legally
14 sufficient support and analysis for its position regarding the correct restitution amount and to
15 identify the specific amounts owed to each investor-victim. While this analysis is nearly complete,
16 the amount of money involved and the number of victim-investors remains substantial.

17 5. As such, the government respectfully moves the Court for a three-day extension to
18 submit its brief regarding restitution.

19 6. The parties have conferred, and counsel for the defendants do not oppose the
20 government's motion.

21 7. For these reasons, the government respectfully requests that the Court grant this
22 motion and set a new deadline for the government's brief of May 6, 2022.

1 Dated: April 29, 2022

2
3 Respectfully submitted,

4 JOSEPH S. BEEMSTERBOER
Acting Chief, Fraud Section
5 Criminal Division
United States Department of Justice

CHRISTOPHER CHIOU
Acting United States Attorney
District of Nevada

6 s/ Della Sentilles
7 CORY E. JACOBS
DELLA SENTILLES
8 Trial Attorneys
Criminal Division, Fraud Section

s/ Jessica Oliva
9 JESSICA OLIVA
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that I am an employee of the United States Department of Justice, Criminal Division, Fraud Section. A copy of this motion was served upon counsel of record, via Electronic Case Filing (ECF).

DATED this 29th day of April, 2022.

/s/ Della Sentilles
DELLA SENTILLES
Trial Attorney
Criminal Division, Fraud Section

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,)

4 Plaintiff,)

5 v.)

6 JUNZO SUZUKI & PAUL SUZUKI,)

7 Defendants.)

2:15-cr-00198-GMN-NJK

[PROPOSED] ORDER

8
9 Before the Court is the United States' Unopposed Motion for an Extension of Time to File
10 Its Brief Regarding Restitution. Based on the statements made in the United States' Motion and
11 finding reasonable cause in support of the Motion:

12 IT IS HEREBY ORDERED: That the United States' Unopposed Motion for an Extension
13 of Time to File Its Brief Regarding Restitution is GRANTED.

14 IT IS FURTHER ORDERED: That the United States' Brief Regarding Restitution is due
15 by **May 6, 2022**.

16
17 **SO ORDERED** on this 2 day of May, 2022.

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20 
21 HONORABLE GLORIA M. NAVARRO
22 UNITED STATES DISTRICT JUDGE
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